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June 16, 2025

**VIA ECF**

Honorable Judge Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Granted.  
There shall be  
no further extension.  
Denise Cote  
June 17, 2025*

**Re:    *Espinoza v. Joe & Pat's Pizzeria, et al.*  
Case No.: 1:23-cv-09133-DLC: Plaintiff's Extension Request to File Motion  
For Summary Judgment**

Dear Honorable Judge Cote:

The undersigned represents Plaintiff Denise Espinoza ("Plaintiff"), in the above-referenced matter, and respectfully requests a one-week extension to file a Motion for Summary Judgment.

Currently, the deadline to file a motion for summary judgment is June 20, 2025 (Dkt. 82). Plaintiff's counsel was in upstate New York last Thursday and Friday for oral arguments in unrelated matters and has not yet received all deposition transcripts for the depositions conducted in this case. These transcripts are essential as Plaintiff intends to move for partial summary judgment and plans to rely on the testimony contained therein. Accordingly, Plaintiff respectfully requests that the deadline be extended to June 27, 2025, with the opposition due Friday, July 18, 2025, and the reply due August 1, 2025. This is Plaintiff's first request for an extension, and Defendants do not object.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

GODDARD LAW PLLC

/s/ Siobhan Klassen

By: Siobhan Klassen, Esq.